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20 *Attorneys for Plaintiff and the Proposed Classes*

21 UNITED STATES DISTRICT COURT
22 DISTRICT OF NEVADA

23 JORGE HERNANDEZ CASTRO, an
24 individual, on behalf of himself and all
25 others similarly situated,

26 Plaintiff,

27 vs.

28 ONE NEVADA CREDIT UNION,

Defendant.

Case No.: 2:22-cv-01563-GMN-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

(FIRST REQUEST)

Complaint Filed: September 16, 2022
Current Response Date: December 27, 2022
New Response Date: January 10, 2023
New Reply Date: January 24, 2023

STIPULATION

Plaintiff Jorge Hernandez Castro (“Plaintiff”) and Defendant One Nevada Credit Union (“One Nevada”), by and through their respective counsel of record, hereby stipulate as follows:

On September 16, 2022, Plaintiff filed the Complaint in this action (Dkt. No. 1);

On October 14, 2022, One Nevada waived service of the Summons in this action, providing One Nevada with 60 days to respond to the Complaint (Dkt. No. 16);

On December 14, 2022, One Nevada filed a Motion to Dismiss Plaintiff’s Complaint (Dkt. No. 17), with a response date of December 27, 2022;

The Parties have conferred and agreed to a 14-day extension of Plaintiff’s deadline to respond to the Motion to Dismiss from December 27, 2022 to January 10, 2023 to allow counsel for Plaintiff sufficient time to prepare such response;

The Parties have conferred and agreed to a 7-day extension of One Nevada’s deadline to file a reply to Plaintiff’s response from January 17, 2023 to January 24, 2023;

The filer of this document attests that the concurrence in the filing of this document has been obtained from counsel for One Nevada under LR IC 5-1(d);

No trial date has been set for this action, the extension requested is not intended for purposes of delay, and no party will be prejudiced by the extension requested;

This is the first request for extension of time in this matter;

The Parties request that, for good cause show, the Court enter an order extending Plaintiff’s deadline to respond to the Motion to Dismiss by fourteen (14) days through January 10, 2023, and extending One Nevada’s deadline to file a reply by seven (7) days through January 24, 2023;

The Parties stipulate and agree, through their undersigned counsel, subject to the Court’s approval, that Plaintiff will have until January 10, 2023 to file its response to the Motion to Dismiss, and that One Nevada will have until January 24, 2023 to file its reply to such response.

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1 Respectfully submitted,

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3 Dated: December 19, 2022

**MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND**

4 /s/ Luis L. Lozada

5 Luis L. Lozada
6 Deylin O. Thrift-Viveros
7 Leticia M. Saucedo
8 MEXICAN AMERICAN LEGAL DEFENSE
9 AND EDUCATIONAL FUND

10 Kathia Quiros
11 GWP IMMIGRATION LAW

*Attorneys for Plaintiff Hernandez Castro and
the Proposed Classes*

12 Dated: December 19, 2022

**GORDON REES SCULLY
MANSUKHANI LLP**

14 /s/ Chad A. Harrison

15 Robert E. Schumacher
16 Chad A. Harrison
17 GORDON REES SCULLY
18 MANSUKHANI LLP

*Attorneys for Defendant One Nevada Credit
Union*

19 **ORDER**

20 **IT IS SO ORDERED.**

21 Dated this 21 day of December, 2022.

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25 Gloria M. Navarro, District Judge
26 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2022, I electronically submitted the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME** to the office of the Clerk of the United States District Court for the District of Nevada for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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Attorneys for Defendant One Nevada Credit Union

Dated: December 19, 2022

/s/ Luis L. Lozada
Luis L. Lozada